

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRANCESCA GINO,)	
)	
Plaintiff,)	
v.)	
)	
PRESIDENT AND FELLOWS OF)	Case No. 1:23-cv-11775-MJJ
HARVARD COLLEGE, SRIKANT)	
DATAR, JOHN DOES 1-10, AND JANE)	
DOES 1-10,)	
)	
Defendants.)	

JOINT STATUS REPORT

The undersigned attorneys of record hereby submit this joint status report in accordance with the Court’s order issued November 20, 2024. Doc. No. 88. The Parties state as follows:

1. **Joint Status Report.** On November 20, 2024, the Court instructed the Parties to file a joint status report by July 18, 2025 in light of the status conference scheduled for July 22, 2025 at 2:45 p.m. Doc. No. 88. The Court instructed the Parties to indicate the “current status of the case, including whether the Parties intend to seek expert discovery and/or intend to file any dispositive motions, whether the Parties are interested in mediation, as well as any other matter relevant to the progress of the case.” *Id.* at 2.

2. **Pleading Amendments.** On July 7, 2025, Defendant President and Fellows of Harvard College (“Harvard”) filed its Motion for Leave to File Second Amended Answer and Counterclaim, seeking leave to amend its Amended Answer (Doc. No. 116) in order to assert a defamation counterclaim against Plaintiff. As indicated in the Parties’ Joint Motion to Enter Amended Scheduling Order (Doc. No. 121), Plaintiff intends to seek leave to file an amended

complaint asserting claims arising out of Harvard's tenure revocation proceeding on or before July 25, 2025.

3. Discovery. The Parties have engaged in initial discovery, which remains in the early stages. On December 4, 2024, the Parties exchanged their Fed. R. Civ. P. 26(a) initial disclosures. On March 31, Plaintiff served her first set of interrogatories and requests for production on Harvard, to which Harvard responded on April 22, 2025. On April 18, 2025, Harvard and Defendant Srikant Datar ("Dean Datar" and, together with Harvard, the "Harvard Defendants") served their first set of interrogatories and requests for production on Plaintiff, to which she responded on May 28 and June 4, 2025. Also on April 18, 2025, Plaintiff served a set of requests for production on Dean Datar, to which he responded on May 19, 2025. The Parties have met and conferred twice to discuss their responses and objections to discovery. While these meetings have been productive, there remains a number of issues on which the Parties have yet to reach agreement. As of today, July 18, 2025, neither party has produced any documents.

4. Expert Discovery. The Parties each intend to engage in expert discovery. Neither party has designated any expert witnesses at this time.

5. Dispositive Motions. Subject to its review of Plaintiff's forthcoming amended complaint, and provided the Court enters the Parties' Proposed Amended Scheduling Order (Doc. No. 121-1), Harvard may file a motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(6) and, if unsuccessful, a motion for summary judgment, as well as a motion for summary judgment as to its counterclaim. Provided the Court enters the Parties' Proposed Amended Scheduling Order (Doc. No. 121-1), Plaintiff may file a motion to dismiss Harvard's counterclaim and, if unsuccessful, a motion for summary judgment as to Harvard's counterclaim, as well as a motion for summary judgment as to her own claims.

6. **Mediation / Alternative Dispute Resolution.** The Parties do not intend to pursue mediation or other alternative dispute resolution at this time.

7. **Stipulated Protective Order / ESI Protocol.** The Parties anticipate that discovery may include sensitive and confidential materials for which it may be necessary to seek permission to file under seal pursuant to Local Rule 7.2. The Parties agree to work cooperatively to reach a mutual agreement on any proposed protective order to protect certain confidential information. The Parties also agree that discovery in this case will include electronically stored information (“ESI”), and they agree to work cooperatively to reach mutually acceptable protocols and standards for the production of ESI in this case. The Parties plan to jointly file stipulated proposed orders for the Court’s consideration in regard to a protective order and ESI protocol.

8. **Additional Discovery to Proceed Pursuant to Default Rules.** As stated in their Joint Statement Pursuant to Rule 26(f) and Local Rule 16.1 (Doc. No. 84), the Parties continue to agree to abide by the default rules with regard to depositions, interrogatories, requests for production and requests for admission, as set forth in Rules 30, 33, 34, and 36 of the Federal Rules of Civil Procedure, respectively.

9. **Settlement Offer.** Plaintiff submitted a settlement demand to the Harvard Defendants on October 29, 2024. Defendants provided a written response to Plaintiff on November 13, 2024. The Parties have not engaged in any further settlement discussions.

10. **Proposed Amended Pretrial Schedule and Discovery Plan**

In light of the status of discovery and the proposed amended pleadings discussed above, counsel for the Parties have conferred and reached agreement on the following proposed amended case schedule. The Parties filed a Motion to Enter Amended Scheduling Order (Doc. No. 121) on July 16, 2025, pursuant to this Court’s Scheduling Order (Doc. No. 88 at 3), reflecting these dates:

Event	Current Deadline	Proposed Deadline
Fact Discovery		
Initial disclosures	December 4, 2024	No change
Amendments to the pleadings	Except for good cause shown, no motions seeking to leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after January 31, 2025	Except for good cause shown, no motions seeking to leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after July 25, 2025
All requests for production of documents and interrogatories shall be served no later than	April 18, 2025	August 18, 2025
All requests for admission shall be served no later than	May 30, 2025	September 1, 2025
Last day for fact witness depositions	July 18, 2025	October 20, 2025
Completion of fact discovery	July 18, 2025	October 20, 2025
Expert Discovery		
Designation of experts and information contemplated by Rule 26(a)(2) by party bearing burden	July 23, 2025	October 23, 2025
Designation of rebuttal experts and information contemplated by Rule 26(a)(2)	August 15, 2025	November 17, 2025
Completion of expert depositions and discovery	September 5, 2025	December 5, 2025
Dispositive Motions		
Motions for summary judgment	October 3, 2025	January 19, 2026
Oppositions to dispositive motions	October 31, 2025	February 16, 2026
Reply memoranda	November 21, 2025	March 9, 2026

Dated: July 18, 2025

Respectfully submitted,

/s/ Patrick J. Hannon

Patrick J. Hannon

Patrick J. Hannon (BBO# 664958)
Barbara A. Robb (BBO# 639976)
Hartley Michon Robb Hannon LLP
101 Federal Street, Suite 1810
Boston, MA 02110
(617) 723-8000
phannon@hmrhlaw.com
brobb@hmrhlaw.com

Attorneys for Plaintiff Francesca Gino

/s/ Douglas E. Brayley

Douglas E. Brayley

Douglas E. Brayley (BBO# 674478)
Jenny K. Cooper (BBO# 646860)
Elena W. Davis (BBO# 695956)
Ropes & Gray LLP
800 Boylston Street
Boston, MA 02199-3600
Tel: (617) 951-7000
Douglas.Brayley@ropesgray.com
Jenny.Cooper@ropesgray.com
Elena.Davis@ropesgray.com

*Attorneys for Defendants President and
Fellows of Harvard College and Srikanth
Datar*

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2025, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: July 18, 2025

/s/ Douglas E. Brayley

Douglas E. Brayley